UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

| PHILLIP MAROTTA, |) | |
|----------------------------------|---|-----------------------|
| |) | |
| Plaintiff, |) | |
| |) | |
| V. |) | C.A. No.: 05-10823RWZ |
| |) | |
| MI-JACK PRODUCTS, INC., FANTUZZI |) | |
| REGGIANE, FANTUZZI USA, INC. and |) | |
| MASSACHUSETTS PORT AUTHORITY, |) | |
| |) | |
| Defendants. |) | |

LOCAL RULE 16.1 CERTIFICATION

The Defendant, Mi-Jack Products, Inc., through its counsel and authorized representative, hereby certify and affirm that they have complied with the requirements of Local Rule 16.1(D)(3) regarding the cost of conducting the litigation, the various forms of alternative courses of the litigation including alternative dispute resolution and the other requirements of Local Rule 16.1.

For the Defendant, MI-JACK PRODUCTS, INC.

Bxits attorney,

James P. Donoliue, r., BBO 4555946

SLOANE AND WALSH, LL.D

Three Center Plaza Boston, MA 02108

617-523-6010

For the Defendant,

MI-JACK PRODUCTS, INC.

By its authorized representative,

Henry B. Gurion, Esq.

Vice President/General Counsel

MI-JACK Products, Inc.

3111 West 167th Street Hazel Crest, IL 60429

Date: July 12, 2005